

**United States Bankruptcy Court  
Northern District of Illinois, Eastern Division**

IN RE: Laura Jean Schweitzer-Tobolaski	)	Chapter 13
	)	Case No. 17 B 22148
Debtor(s)	)	Judge A. Benjamin Goldgar

**Notice of Motion/Certificate of Service**

Laura Jean Schweitzer-Tobolaski  
P O Box 273  
La Grange, IL 60525

Debtor Attorney: Sulaiman Law Group Ltd  
via Clerk's ECF noticing procedures

On February 04, 2020 at 10:00AM, I will appear at the location listed to the right, and present this motion, a copy which is hereby served upon you.

> Dirksen Federal Building  
> 219 South Dearborn  
> Courtroom 642  
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Thursday, January 23, 2020.

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case for Material Default**

Comes now Marilyn O. Marshall, Standing Trustee, pursuant to 11 U.S.C. § 1307(c)(6), and respectfully states the following:

1. This is a core proceeding under 28 U.S.C. § 157.
2. Debtor filed for Chapter 13 relief on July 25, 2017.
3. This case was confirmed on January 23, 2018, for a total of 60 months with plan payments of \$404.00.
4. As of the filing of this motion, 30 months have expired since this case was filed.
5. The plan is in material default as it cannot complete at the proposed terms.
6. The balance on this case is approximately \$15,673.54 and at the current rate, the plan will not complete for another 39 months.

WHEREFORE, the Trustee prays that the Court enter an order dismissing this case, and grant any such other relief as it may deem proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE